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Henrichs Reply Affidavit – Attachment B

Report of Independent Auditors

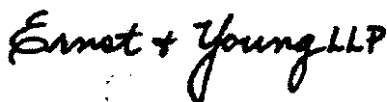
The Board of Directors of Pacific Bell Telephone Company

We have audited, in accordance with generally accepted auditing standards, the consolidated balance sheet of Pacific Bell Telephone Company (the Company) (a wholly-owned subsidiary of Pacific Telesis Group, a wholly-owned subsidiary of SBC Communications, Inc.) at December 31, 1999 and the related consolidated statements of income, shareowner's equity and cash flows for the year then ended and have issued our report dated February 11, 2000 in which we expressed an unqualified opinion on those financial statements. We have also audited the accompanying Company's Federal Communications Commission (the FCC) Report 43-03, ARMIS Joint Cost Report Submission #1 Columns (b) through (j) (hereafter referred to as "FCC Report 43-03") as of and for the year ended December 31, 1999. As described in Note 1, this report was prepared pursuant to the Company's Cost Allocation Manual, the FCC's Joint Cost Orders issued in conjunction with CC Docket No. 86-111, and the FCC's published rules and regulations thereto (47CFR Sections 32.23, 32.27, 64.901, and 64.903) in force as of December 31, 1999. This report was prepared for the purpose of complying with those rules and regulations and is not intended to be a complete presentation of the Company's financial statements. The FCC Report 43-03 is the responsibility of the Company's management. Our responsibility is to express an opinion on the FCC Report 43-03 based on our audit.

We conducted our audit of the FCC Report 43-03 in accordance with generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the FCC Report 43-03 is free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the report. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall report presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the FCC Report 43-03 referred to above presents fairly, in all material respects, the information of the Company required to be set forth therein as of and for the year ended December 31, 1999, in accordance with the Company's Cost Allocation Manual, the FCC's Joint Cost Orders issued in conjunction with CC Docket No. 86-111, and the FCC's published rules and regulations thereto (47 CFR Sections 32.23, 32.27, 64.901, and 64.903) in force as of December 31, 1999.

This report is intended for the information of the Company and the FCC, which established the criteria against which the FCC Report 43-03 was evaluated. Accordingly, this report should not be used for any other purpose.



March 21, 2000

Report of Independent Auditors

The Board of Directors of
Pacific Bell

We have audited, in accordance with auditing standards generally accepted in the United States the balance sheets of Pacific Bell (the Company), an indirect wholly-owned subsidiary of SBC Communications Inc., as of December 31, 2001 and 2000, and the related statements of income, shareowner's equity and cash flows for the years then ended and have issued our report dated February 8, 2002, in which we expressed an unqualified opinion on those financial statements. We have also audited the accompanying Company's Federal Communications Commission (the "FCC") Report 43-03s ARMIS Joint Cost Reports columns (b) through (j) (the "FCC Report 43-03s") as of and for the years ended December 31, 2001 (Submission #1) and 2000 (Submission #5). As described in Note I to the FCC Report 43-03s, these reports were prepared pursuant to the Company's Cost Allocation Manuals, the FCC's Joint Cost Orders issued in conjunction with CC Docket No. 86-111 and the FCC's published rules and regulations thereto (47 CFR Sections 32.23, 32.27, 64.901 and 64.903) in force as of December 31, 2001 and 2000. These reports were prepared for the purpose of complying with those rules and regulations and are not intended to be a complete presentation of the Company's financial statements. The FCC Report 43-03s are the responsibility of the Company's management. Our responsibility is to express an opinion on the FCC Report 43-03s based on our audits.

We conducted our audits of the FCC Report 43-03s in accordance with auditing standards generally accepted in the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the FCC Report 43-03s are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the report. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall report presentation. We believe that our audits provide a reasonable basis for our opinions.

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This report is intended for the information of the Company and the FCC, which established the criteria against which the FCC Report 43-03s were audited. Accordingly, this report should not be used for any other purpose.

Ernst & Young LLP

March 21, 2002

Report of Independent Auditors

The Board of Directors of
Pacific Bell

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In our opinion, the FCC Report 43-03s referred to above present fairly, in all material respects, the information of the Company required to be set forth therein as of and for the years ended December 31, 2001 and 2000 in accordance with the Company's Cost Allocation Manuals, the FCC's Joint Cost Orders issued in conjunction with CC Docket No. 86-111, and the FCC's published rules and regulations thereto (47 CFR Sections 32.23, 32.27, 64.901 and 64.903) in force as of December 31, 2001 and 2000, respectively.

This report is intended for the information of the Company and the FCC, which established the criteria against which the FCC Report 43-03s were audited. Accordingly, this report should not be used for any other purpose.

Ernst + Young LLP

March 22, 2002

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

In the Matter of)	
)	
Application by SBC Communications Inc.,)	
Pacific Bell Telephone Company, and)	WC Docket No. 02-306
Southwestern Bell Communications Services,)	
Inc. for Provision of In-Region, InterLATA)	
Services in California)	

JOINT REPLY AFFIDAVIT OF
STEPHEN D. HUSTON AND BETH LAWSON
REGARDING OPERATIONAL SUPPORT SYSTEMS

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Attachment D	AT&T MCPSC Tickets for September 4, 2002 (Confidential)
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Attachment G	Copy of Ticket # 9866395 (Confidential)
Attachment H	Post POR Analysis for AT&T (Confidential)

The undersigned, being each of lawful age and duly sworn upon by oath, do hereby state as follows:

INTRODUCTION

1. My name is Stephen D. Huston. I am the same Stephen D. Huston who filed direct testimony in this proceeding. I am employed by SBC Pacific Bell Telephone Company (“Pacific”) as Director, Operational Support Systems (“OSS”) Customer Support.
2. My name is Beth Lawson. I am the same Beth Lawson who filed direct testimony in this proceeding. I am employed by SBC Southwestern Bell Telephone Company (“SWBT”) as Director, OSS Regulatory Support.

PURPOSE OF AFFIDAVIT

3. The purpose of this reply affidavit is to respond to allegations in this proceeding made in the Declaration of Walter W. Willard on behalf of AT&T Corporation regarding the Mechanized Customer Production Support Center (“MCPSC”), alternative community information, **the** performance of Pacific’s EDI in handling UNE-P – and specifically using LSOG 5 for UNE-P, and Pacific’s test environment.

MECHANIZED CUSTOMER PRODUCTION SUPPORT CENTER

4. As noted in our initial affidavit, the MCPSC was established in 2000, to provide CLECs enhanced support in the use of OSS. The center was established in response to agreements made in conditions associated with the SBC/Ameritech (“AIT”) merger, and was intended to handle those CLEC *OSS* business process issues that were not, at that time, assigned to a specific SBC center.¹

SBC and Pacific Provide CLECs with Adequate Technical Assistance and Help Desk Support and Clearly Defines the Functions Assigned to Support Organizations

5. One goal of the SBC/AIT merger commitments was to establish common systems and business **rules** for SBC’s entire 13-state operating region. Accordingly, in the year 2000, the work groups that support CLEC electronic systems began to migrate to 13-state support groups. Thus, the IS Call Center (which supports access issues related to SBC’s OSS), the OSS CLEC Support group (which provides technical support to CLECs during implementation and utilization of SBC’s OSS), and the MCPSC (which provides support for business rules and processes for CLEC’s utilizing SBC’s *OSS*), are all 13-state support groups. Huston/Lawson Aff. ¶¶ 83. Pacific’s Local Service Center (“LSC”), on the other hand, is specific to the Pacific Bell/Nevada Bell (“PB/NB”) region and is primarily associated with manual processes.’
6. AT&T alleges that “Pacific has never clearly delineated the division of responsibilities ... between the MCPSC and the LSC.” Declaration of Walter W. Willard on Behalf of AT&T Corp., ¶ 25 (“Willard Decl.”). The three Accessible Letters attached to AT&T’s

¹ See Joint Affidavit of Stephen D. Huston and Beth Lawson, ¶ 93 (“Huston/Lawson Aff.”) (App. A, Tab 11).

² See, e.g., Huston/Lawson Aff. ¶¶ 28, 75, 156, 178, 190, & 198.

comments, however, clearly demonstrate that Pacific and SBC consistently have provided AT&T and other CLECs with clear definitions of the functions of its various support groups. Willard Decl. Attachments 3-5. While SBC has clarified and refined those definitions, the function of the MCPSC has in fact changed very little during the two years it has been in place.

7. Accessible Letter CLECCS00-158, dated September 15, 2000, announces the October 2, 2000 effective date for the establishment of the MCPSC in the Pacific region. Willard Decl. Attachment 3. This letter publishes a toll-free contact number and notes that the MCPSC should be contacted for “CLEC inquiries involving pre-ordering and/or ordering activity via an OSS...” *Id.* The very title of the new support group, the Mechanized Customer Production Support Center sets it apart from the LSC, which has always been primarily associated with manual processes. In addition, the profile for the MCPSC has been posted in the CLEC Handbook since January 2001. This profile is provided as Attachment A to this affidavit, and also delineates the types of calls to be handled by the IS Call Center **and** the LSC as well as the MCPSC.
8. AT&T also attaches a draft Accessible Letter sent to CLECs in SBC’s SWBT region in August 2001. Contrary to AT&T’s claims, that letter also clearly outlined the responsibilities of the MCPSC and the IS Call Center, which, as explained above, both serve all 13 SBC states. See Willard Attachment 4. The functions performed by the MCPSC were detailed, and are essentially the same as the responsibilities defined in the third Accessible Letter that AT&T attaches. *See* Willard Attachment 5 (attaching Accessible Letter CLECC02-068 (Feb. 26, 2002)). That letter clearly indicates the distinct roles and responsibilities of PB/NB’s **LSC** and the 13-state MCPSC. Thus, by its

own admission, AT&T has had access to the information defining the responsibilities of the MCPSC since (at least) August 2001.

9. At a high level, the MCPSC deals with mechanized pre-order and order issues, including system navigation, user guide, and business rules issues. In contrast, the LSC handles provisioning and billing, and issues requiring manual processing (*e.g.*, jeopardies, manual rejects, etc). Put another way, there is not even a vague reference in Pacific's documentation associating its LSC responsibilities with CLEC use of electronic interfaces for pre-order and order – other than manual fall out – so AT&T's alleged confusion is puzzling.
10. AT&T further claims that “the most troubling aspect” of the MCPSC is that there are no performance measurements for the MCPSC. Willard Decl. ¶ 32. AT&T further asserts that Pacific “evades” its reporting requirements by compelling CLECs to use a center (the MSPSC) for which there are no performance measurements. *Id.* In fact, as addressed in more detail in the Affidavit of Gwen Johnson (Reply App., Tab 10), AT&T has had ample opportunity to request performance measurements for the MCPSC since it was established in October 2000, yet has only recently (October 16, 2002) done so.

AT&T's Complaints Related to the Level of Assistance Provided by the MCPSC Are Caused, in Part, by AT&T's Own Misuse of the MCPSC

11. AT&T alleges that it experiences long hold times that supposedly result from “insufficient staffing at the MCPSC to handle the volume of calls that it receives from CLECs.” Willard Decl. ¶ 28. Increased hold times in **April** and May 2002, which resulted from the implementation of the Plan of Record (“POR”) were addressed in detail in our initial affidavit. *See* Huston/Lawson Aff. ¶¶ 267-270. Hold times have improved

substantially since POR implementation, and the average answer time for the PB/NB and SWBT regions for the past three months was 1:29 (minutes/seconds) in July, 3:43 in August, and 1:17 in September. The MCPSC call volumes and answer times for the PB/NB and SWBT region are provided as Attachment B to this reply affidavit. Hold times and call loads are continually evaluated to ensure the MCPSC is functioning effectively. Further, alternate contact methods to open a ticket via SBC's CLEC Online website have recently been implemented to provide CLECs more options.³

12. AT&T also claims MCPSC managers "lack the training and expertise to deal with the specific OSS problems that AT&T has raised." Willard Decl. ¶ 29. However, in many cases, it is the AT&T service representatives placing calls to the MCPSC who lack the necessary training. For example, on August 27, 2002, an AT&T representative repeatedly called the MCPSC requesting assistance on an order that had been rejected. She was informed that the cause of the reject was an AT&T internal interface coding issue, of which AT&T was aware through discussions with SBC in center-to-center conference calls.⁴ The representative acknowledged that AT&T was aware of the issue, but stated that her company had not provided its representatives with an update on the issue status for approximately 2-3 weeks. In one day, this one AT&T representative made several calls concerning this one ticket, requiring the involvement of no less than

³ As noted below, AT&T has stated that its desktops do not accommodate all the support tools (such as the CLEC Online website) that SBC offers to CLECs. See ¶ 13, *infra*.

⁴ This issue involved AT&T's failure to code the NCON (or New Construction) field into its systems. On center-to-center calls (prior to the calls from this one AT&T service representative) SBC offered to have a SME from the LSC walk AT&T through the requirements for filling out a manual LSR until AT&T was able to code the NCON field in its system. Eventually, after more than *** LSRs were rejected and needed to be worked, AT&T accepted SBC's offer.

seven MCPSC managers – *all* for an issue that was entirely internal to AT&T.⁵ A copy of the ticket relating to these calls is provided as Attachment C (Confidential),

13. In an attempt to educate AT&T and to eliminate unwarranted calls to SBC's support centers, the MCPSC, the OSS CLEC Support Team and SBC's CLEC training organization conducted a meeting with AT&T on July 23, 2002, after an analysis of AT&T's POR calls into the MCPSC. SBC's goal was to make available to AT&T whatever resources necessary to help improve AT&T internal expertise, thereby eliminating needless and excessive calls into the MCPSC. The analysis provided to and discussed with AT&T at that meeting is Attachment D (Confidential) to this reply affidavit. During this meeting ~~an~~ AT&T representative stated that its desktops were not equipped to use all of the tools that SBC has made available to the CLEC community, therefore AT&T representatives were unable to perform some of the pre-order functions necessary for AT&T to submit accurate mechanized transactions!
14. AT&T claims that SBC has "created substantial confusion among CLECs as to whether they should contact the MCPSC, or the LSC, to resolve particular problems." Willard Decl. ¶ 26. However, the real **source** of this confusion seems to be AT&T's refusal to train its representatives in proper procedure for calling the centers. Not only does SBC's

⁵ In fact, while this particular AT&T representative was holding on the phone with one manager, who was investigating this issue, she called the exact same issue in to a different MCPSC manager.

⁶ For example, although AT&T may not use (or allow access to) Enhanced Verigate for pre-ordering, the Order Status and Provisioning Order Status functions are available to a CLEC **using** an LSPOR 5.00 and later versions of an application-to-application interface. However, before a CLEC **has** access to **this** functionality via its application-to-application interface, it is first required to build **this** functionality into its system. Another example of "new" functionality that requires construction on the CLEC side of an application-to-application interface includes the Directory Listing Inquiry function, available with LSPOR 5.01. Lack of the Directory Listing function impacts AT&T's ability to determine whether an end user has an alternative community directory listing, as discussed in the following **section** of this reply affidavit.

documentation spell out that manual rejects should be referred to the LSC (*see* Willard Decl. Attachment 5; *Huston/Lawson Reply Aff.* Attachment A) but the proper procedure for manual rejects has also been specifically and repeatedly addressed with AT&T on Pacific's center-to-center calls. Despite this, AT&T representatives continue to call the MCPSC when they receive a manual reject – and several AT&T representatives have told the MCPSC that AT&T provided written instructions to call the MCPSC for manual rejects. A copy of the ticket, dated October 16, 2002, confirming these instructions is provided as Attachment E (Confidential).

15. At the same time that AT&T claims that MCPSC personnel are not adequately trained, AT&T's own representatives continue to demonstrate deficiencies in knowledge and expertise. Recently (on October 23, 2002) an AT&T service representative attempted to cancel an order. This AT&T representative claimed not to know what a Purchase Order Number ("PON"), a Company Code, or an end user was. In addition, he had no idea whether the LSR had been submitted via Web-LEX or EDI. A copy of an email describing the MCPSC's encounter with this untrained AT&T service representative is provided as Attachment F (Confidential)? It is not the responsibility of the MCPSC to train CLEC personnel. Despite the fact that this issue has been an ongoing problem with AT&T and the subject of many center-to-center calls, SBC has seen little improvement.
16. While AT&T's failure to train its service representatives – or, at a minimum, its failure to address proper procedure with its service representatives – causes needless duplicate and

⁷ Not only was this AT&T service representative uninformed as to basic LSR terminology and processes, but he did not follow the established procedure in contacting the MCPSC. Instead of contacting the help desk number, this AT&T representative contacted an escalation manager for the SWBT region on a private number not provided to CLECs (his issue occurred in the AIT region), even though he had not first created a ticket for investigation.

misdirected calls, these calls are nevertheless requests *from a CLEC* for support, which Pacific addresses diligently and in good faith. Recently, however (on October 24, 2002), **an** AT&T service representative directed **an AT&T customer** to call the MCPSC (in fact, the AT&T representative gave its end user the call in number for the MCPSC) to inquire why Pacific had rejected the order placed by AT&T for service to his girlfriend's apartment. This is not just a lack of training issue, but is an example of AT&T's abuse of the support services provided by SBC to CLECs. A copy of the ticket describing this situation is provided as Attachment G (Confidential).

17. Attachment H (Confidential) to this affidavit is an analysis of all of AT&T calls into the MCPSC center on September 4, 2002. As this attachment demonstrates, a total of *** tickets were created in response to AT&T's calls on that day. Out of those *** tickets, *** (or 73%) were either misdirected, or the issue prompting the call was caused by CLEC input error.
18. In summary, the establishment of the MCPSC was **an** effort to enhance support to CLECs. No other CLEC has raised MCPSC effectiveness as an issue in this proceeding. Moreover, the effectiveness of any center-to-center operation depends on the effectiveness of employees at both companies.

ACCESS TO PRE-ORDER ALTERNATIVE COMMUNITY INFORMATION

19. In certain geographic areas in its region, Pacific offers end users "alternative community name" white pages listings. Thus, for example, an end user living in Danville, California (the "postal" community for that end user) may elect to have Blackhawk (the "alternative" or "prestige," community name) listed as his or her community in the white pages directory. AT&T alleges not only that Pacific fails to provide sufficient access to

directory listing information and pre-order information relating to alternative community names, but also that AT&T’s “invalid community name” rejections are caused by its lack of access to this information. Willard Decl. ¶¶ 11-21. As we explain below, Pacific provides pre-order access to both directory listings and alternative community name information; Pacific makes available to CLECs the alternative community listings that are available to Pacific’s retail customers; and the rejections AT&T references do not result *from* any supposed lack of access to alternative community name information.

Pacific Provides Nondiscriminatory Access to Pre-Order Information (Including Alternative Community Information and Directory Listings) via Its Pre-Order Interfaces

20. AT&T alleges that “Pacific provides virtually no guidance regarding the areas where alternative community names are available.” Willard Decl. **720**. This assertion surprises Pacific, because AT&T is clearly aware that Pacific makes available a “flat file,” which is similar *to* an Excel spreadsheet containing data fields, consisting of available alternative community names. This “flat file” provides all community names in California and Nevada together with their associated alternative name(s), **NPA**s, and zip codes. Indeed, AT&T not only references this document multiple times in its comments, but also provides the entire document **as** Attachment 1 to the Willard Declaration.
21. In addition to the flat file posted on the website, Pacific provides a “Data Validation Files” link in Enhanced Verigate to this document, so a CLEC need not “access [both] the website *and* use Pacific’s electronic interfaces in order to obtain accurate ordering information necessary” as alleged by AT&T.⁸ Willard Decl. ¶ 17, n.3. Information related to alternative community names as well as traditional pre-order information is

⁸ The “Community Names/Alternative Communities” link **was** added to the Data Validation Files in Enhanced Verigate on September 13, 2002.

provided via access to one of Pacific's pre-order interfaces. The Data Validation link to the alternative community information is available only in Enhanced Verigate. However, a CLEC can copy and transfer the flat file to a table or database within a CLEC's own system, allowing integration of this information to those CLECs using application-to-application interfaces for pre-order.

22. AT&T also complains that the flat file "simply provides abbreviations, which may not be readily identifiable to the AT&T service representative..." Willard Decl. ¶ 17. However, the Data Validation link in Enhanced Verigate also provides a link to a community abbreviations file (posted on the CLEC Online website), which lists all abbreviations used in the flat file and spells out the name for each. CLECs may copy **and** integrate this file into their application-to-application pre-order interfaces. Accordingly, information contained in the abbreviations file can be accessed by any CLEC that wants to populate valid abbreviations in the LSR fields associated with community names.
23. However it is accessed, this information allows CLECs to determine whether there is an available alternative community name for **a** particular end user's address and, if so, to offer that alternative listing to its end user. Information on the availability of alternative community names, including how to order them, is available at Section 4.13.2 of the CLEC Handbook White Pages User Guide. If the end user orders **an** alternative community on his or her directory listing, the CLEC simply provides the alternative community name on the Directory Listing ("DL") portion of the LSR. Currently, AT&T has more than *** active listings in the PB/NB region that use alternative community names. Of those, more than *** were ordered as part of a new or

changed directory listing. AT&T is thus plainly able to provide such listings to its end users customers.

24. Furthermore, contrary to AT&T's allegation, CLECs also have access to information about the community name an individual end user has chosen for his white pages directory listing. Willard Decl. ¶ 17. Specifically, with the implementation of LSPOR 5.01 in August 2002, Pacific's pre-order interfaces include a Directory Listing Inquiry function, which allows a CLEC to view the end user's directory listing.⁹ Huston/Lawson Aff. ¶ 112. This transaction returns the community name on the end user's directory listing electronically within seconds. Thus, CLECs currently have access to both alternative community name information as well as to directory listing information for specific end users.

AT&T's "Invalid Community Name" Rejections Were Not Caused by Lack of Access to Pre-Order Information

25. AT&T alleges that 5.9% of the UNE-P LSRs it submitted in August of this year were rejected for "invalid community name," and contends that those rejects resulted from lack of access to alternative community name information. Willard Decl. ¶¶ 11-19. As shown above, Pacific does provide electronic access to alternative community name information. Further, as set out in detail below, the "invalid community name" rejects received by AT&T did not result from lack of access to such information.
26. In response to AT&T's allegations, Pacific conducted its own investigation of "invalid community name" rejects received on AT&T's UNE-P orders in August. The results of

⁹ This Directory Listing Inquiry function is available in Enhanced Verigate, EDI, and CORBA.

that investigation show that AT&T received “invalid community name” rejects on approximately 1.4% of the unique UNE-P PONs it submitted that month. Looking at total PONs submitted by AT&T in August (including order types other than UNE-P), it appears that approximately 10% of the errors which resulted in “invalid community name” rejects were the result of AT&T input errors. The remaining errors appear to have been caused by two systems issues, which Pacific has corrected, and which *are* discussed below.

27. **As** an initial matter, when a CLEC **seeks** to migrate an end user to UNE-P or resale with no change to the directory listing, there is no need for the CLEC to provide any community name on the LSR it uses to order service. Community name information is only required in the ordering process if a CLEC **seeks** to change **an** existing directory listing, or to establish a brand new listing. *In* that instance, the CLEC must submit two LSR forms containing “community name” information for the end user: the End User (“EU”) form, which establishes the service address; and **the** Directory Listing (“DL”) form which, **as** noted earlier, **sets** up **the** directory listing. On the EU form, the postal community name is populated in the CITY field. If the CLEC wants the alternative community name to be listed in the directory, that information is provided in the Listed Address Location (“LALOC”) field on the DL form.
28. Prior to October 9,2002, Pacific’s Listings Gateway (“LGW”) (which processes address information from the EU and DL forms) did not recognize valid abbreviations for either postal or alternative community addresses. For instance, although the abbreviation of “**DAN**” for Danville should have been accepted by the LGW, a reject was returned instead. This edit was corrected with a programming change on October 9,2002. Pacific

subsequently discovered that, while the LGW now recognized valid abbreviations, it would still return a reject in those instances where the CLEC (for whatever reason) populated the CITY field on the EU form with an abbreviation, but populated the LALOC field on the DL form with the full community name. A fix was implemented to correct this anomaly on October 24, 2002.

29. On an Address Validation Inquiry sent prior to October 15, 2002, Pacific's pre-order interfaces would return the alternative community name for the end user, when available, rather than the postal community name. Pacific's business rules instruct the CLEC to use the community name returned on the Address Validation Inquiry to populate the CITY field on the EU form. However, because the LGW edits the EU form for the end **user's** actual location (*i.e.*, the postal community), use of the alternative community address results in a reject. Accordingly, if the Address Validation Inquiry returned **an** alternative community name to the CLEC, and the CLEC used that name to populate the CITY field, it would receive an "invalid community name" reject.
30. Effective October 15, 2002, Pacific modified its systems so that **an** Address Validation Inquiry sent via the Enhanced Verigate, EDI or CORBA pre-ordering interfaces would return the postal community name to the CLEC, rather than an available alternative name. On November 1, 2002, while continuing to investigate examples of "invalid community name" rejects submitted by AT&T, Pacific discovered that it inadvertently had not applied the above referenced modification to the 3.06 version of EDI and CORBA. This oversight was corrected on November **2, 2002**. These corrections have been tested and validated, and should prevent improper rejects resulting from use of the community name returned by the Address Validation Inquiry to populate the EU form.

31. Pacific has investigated numerous PONs provided by AT&T for which AT&T received “invalid community name” rejects. To the extent the PONS in question were rejected due to system issues (as opposed to CLEC error), those issues have been addressed by the modifications discussed above. Pacific will continue to work with AT&T and other CLECs to resolve any systems-related problems that may arise.

UNE-P

32. AT&T takes issue with one narrow aspect of Pacific’s showing that its OSS are operationally ready. Willard Decl. ¶ 43. Specifically, AT&T suggests that Pacific has not shown that sufficient commercial data exists to evaluate the performance of Pacific’s OSS in handling **UNE-P** orders submitted via the EDI ordering interface. **Id.**, ¶ 44.
- AT&T is wrong.

Pacific’s Evidence Related to UNE-P Volumes and UNE-P Volumes via EDI.

33. Pacific demonstrated that its ordering interfaces are handling more than “sufficient” commercial volume to support its claim of operational readiness. As presented in our initial affidavit, Pacific’s commercial volumes – both on its pre-order and order interfaces – far outstripped the volumes presented in SWBT’s Texas 271 application.”
- Huston/Lawson Aff. ¶¶ 8-20.
34. Furthermore, Pacific presented evidence that its ordering systems were handling commercial volumes of UNE-P in the **flow** through section of the OSS affidavit. In addition, while addressing CLEC complaints presented to (and rejected by) the California

¹⁰ Pacific’s pre-ordering interface volume was 238% greater than SWBT’s pre-ordering interface volume at the time of its Texas 271 application. Huston/Lawson Aff. ¶ 14. Pacific’s ordering interface volume was 244% greater than SWBT’s ordering interface volume at the time of its Texas 271 application. Huston/Lawson Aff. ¶ 18.

PUC that UNE-P via EDI was not adequately tested in the California OSS Test, Pacific noted that “LSRs submitted via EDI and LEX in July 2002 created more than 80,000 UNE-P service orders.” Huston/Lawson Aff. ¶ 65.

35. But AT&T complains that Pacific does not specify the volume of UNE-P service orders itemized by EDI and Web-LEX. Willard Decl. ¶ 46. Pacific presented data on combined volumes of UNE-P ordering via Web-LEX and EDI because only combined volumes *are* required in its performance measurements. The CPUC-approved business rules for notices and flow through recognize the fact that LASR (which is the system that has all the edits and business rules) does not distinguish an LSR based on its originating interface. Whether an LSR is submitted via Web-LEX or EDI, all editing and downstream processing takes place without regard to the originating interface, and therefore performance measurements for notices and flow through combine results for Web-LEX and EDI.
36. Furthermore, if *any* volumes of a specific product are successfully *received* by either Web-LEX or EDI – all volumes of this product are capable of receipt, as long as that interface is scaled to handle current and future volumes of total transactions. In other words, if either Web-LEX or EDI handles sufficient volumes of Product A, and it has already been demonstrated that both interfaces are scaled to handle commercial volumes, then both interfaces are capable of handling commercial volumes of Product A.

37. Nonetheless, EDI, alone, is currently handling commercial volumes of UNE-P transactions. The following table presents volume data for UNE-P service orders created in July through September **2002**, disaggregated by the Web-LEX and EDI interfaces:”

PB/NB UNE-P SERVICE ORDERS			
	EDI	LEX	TOTAL
July	73,152	10,715	83,867
August	92,120	16,741	108,861
September	119,945	18,295	138,240

38. From July through September **2002**, therefore, the PB/NB region has processed approximately **285,000** UNE-P service orders created from LSRs submitted via EDI, as well as another approximately 45,000 UNE-P service orders created from LSRs submitted via Web-LEX. These are unquestionably commercial volumes of UNE-P orders.

Pacific’s Evidence Related to UNE-P and **LSOG 5**

39. AT&T further alleges that “Pacific’s application fails to present any data regarding either the extent to which CLECs are using Pacific’s **LSOG 5** release to submit UNE-P orders via EDI, or the performance of the OSS in handling those orders.” Willard Decl. ¶ 47. As set out above, the primary reason why Pacific data is not presented in this manner is because there are no differences between the editing or business rules of Web-LEX and EDI, and because, per the CPUC-approved measurement plan, performance is highly disaggregated by product and order type rather than by interface. Huston/Lawson Aff. ¶ 193.

¹¹ The data reported in this reply affidavit and its attachments are derived from SBC’s internal databases, and constitute the best information available to SBC and Pacific at the time of filing.

40. Moreover, while Pacific does not independently measure performance or track volumes based upon the release version used by CLECs, all GUI interface measurements apply to the most current release.¹² This means that from April 10, 2002 until August 2, 2002, all Enhanced Verigate and Web-LEX based transactions were measured on LSPOWLSOR 5.00 performance. These interfaces are now being measured on the performance of LSPOWLSOR 5.01. Accordingly, despite AT&T's allegation, Pacific's performance measurements do take the most current release into account.
41. AT&T erroneously claims that "LSOG 5, as implemented in the former Ameritech region sewed by SBC, **has** already proven to be seriously defective." Willard Decl. ¶ 49. As evidence, AT&T cites difficulties experienced by McLeod in implementing LSOG 5, implying that **the** same difficulties may yet be experienced in California. *Id.* The same difficulties experienced by McLeod will not be experienced by any CLEC already in production using EDI because McLeod **was** in production using Issue 7 in the AIT region." Comparatively speaking, a CLEC's migration from **Issue** 7 to LSOG 5 is a major code and development effort and CLECs migrating from Issue 7 to LSOG 5 in AIT are challenged with developing an entire new EDI gateway. Because upgrading to an LSOG version from Issue 7 is upgrading to a completely new platform, extensive testing is required.

¹² In fact, the GUI transactions – at the very least – are measuring the most current release. The application-to-application measurements may pertain to any of the three releases available (including, as of this date, LSPOR/LSOR 3.06, 5.00, and 5.01).

¹³ Issue 7 in AIT **was** based on the **TCIF** Issue 7 EDI Guidelines which was LSOG 1 "plus." In contrast, California CLECs in production using EDI would have been on LSOR 3.05 or 3.06 upgrading to LSOR 5.00 - or **on** LSOR 3.06 and 5.00 upgrading to LSOR 5.01.

42. Pacific does not mean to imply that there is no work required for a California CLEC to migrate from LSOR 3.06 to 5.00. While it is true that more EDI coding changes are required for a CLEC upgrading between LSOG versions (for example, from LSOR 3.06 to 5.00) than are required to upgrade within the same LSOG version (for example, from LSOR 3.05 to 3.06), the process is essentially the same. In any case, SBC documents these changes, both on its EDI Support website and in the Local Service Ordering Requirements (“LSOR”) for LSOR 5.00 and going forward. CLECs in other SBC regions currently submit UNE-P service requests via EDI using the same LSOG 5 available in California, so if AT&T expends the time and effort to upgrade its EDI (rather than complain about the possibility that nebulous defects may arise from LSOG 5 implementation), it too can successfully use LSOG 5 for UNE-P.
43. Finally, using the information and support mechanisms Pacific makes available to CLECs seeking to develop an EDI interface, NightFire developed an integrated EDI interface on the LSOR 5.00 version. *See* Affidavit of Syed M. Saifullah, (App. A, Tab 18). NightFire also received order confirmations on its test UNE-P LSRs, demonstrating that its EDI interface successfully passed the orders to Pacific’s EDI interface. *Id.*

TEST ENVIRONMENT

44. AT&T alleges that Pacific’s test environment does not “mirror the production environment” because it performs testing only for accounts in Northern California and it does not permit a CLEC to test return notices in an older LSOR version. Willard Decl. ¶¶ 34-42. It should be noted that no other California CLEC has raised issues with Pacific’s test environment – and more than 60 CLECs used EDI in July. Huston/Lawson Aff. ¶ 161.

45. First, Pacific explained that its test environment mirrors its production environment in both the Southern and Northern California regions. *Huston/Lawson Aff.* ¶¶ 244-245. As noted previously, the EDI mapping for formatting an LSR, the system production edits (which, for example, will result in the rejection of an incorrectly populated LSR), and the business rules for populating an LSR are the **same** for Pacific’s Northern and Southern California operating areas. *Id.*
46. Although AT&T argued before the CPUC that it could not adequately test any orders in the Southern region of California, it has now abandoned that argument and claims only that it cannot adequately test the two LATAs in California that overlap the Northern and Southern regions. *Willard Decl.* ¶¶ 35-37. AT&T is not alleging that the capacity to test in only the Northern region is an impediment to competition – it is only complaining that it is unable to test the accuracy of its own internal tables for two LATAs. The primary goals of the test environment are to allow CLECs to test during implementation of EDI in preparation for production and to test coding changes required for new releases. While the test environment also allows testing for internal CLEC purposes, that is not its primary purpose and it is the CLEC’s responsibility to determine the most effective way to accomplish its own internal testing. In any event, AT&T’s allegation is not accurate.
47. If AT&T sends through a test LSR for a NPA/NXX with a Northern region BAN and the LSR is not rejected, it can be assured its table for that NPA/NXX is accurate. If, on the other hand, it sends through a test LSR for a NPA/NXX in the Southern region and a Northern region BAN, that LSR will be rejected for “invalid BAN” or “invalid service address.” The CLEC can then deduce that the NPA/NXX is not associated with the Northern region and there is only one other alternative—the NPA/NXX must be

associated with the Southern region BAN.¹⁴ In fact, this precisely mirrors the production environment because if AT&T submits these LSR examples in production, it would receive the identical response.

48. AT&T also complains that Pacific poorly documents the NPA/NXX and BAN associations in these LATAs, ~~thus~~ making testing capability more critical. *Id.*, ¶ 38. Once AT&T has completely tested its internal table for the NPA/NXXs in use, changes to BANs assigned to those NPA/NXXs are not likely. AT&T and all subscribing CLECs have access to the Local Exchange Routing Guide (“LERG”), which provides ~~an~~ industry listing of all LATAs and NPA/NXXs assigned in the LATAs. Whenever a new NXX is added to ~~an~~ existing NPA, parties subscribing to the LERG receive an update. AT&T can test the new NXX at the time of its implementation – at the same time it must add this new NXX to other tables within its system.
49. ~~An~~ even better alternative to the LERG information (which does not list Northern / Southern regions), would be to access the Enhanced Verigate User Guide, which has the Street Address Guide Abbreviation (“SAGA”) information. The SAGA Guide indicates whether to use the Northern or Southern systems – equivalent to indicating whether to use a Northern or Southern BAN. This information, combined with the city of residence for the CLEC end user, can be used to determine what BAN should be used on an LSR.
50. Second, AT&T alleges that Pacific’s test environment does not reflect the production environment that will exist when AT&T converts to a new version of EDI because it will not return notifications in ~~an~~ older EDI version. Willard **Decl.** ¶ 41. In fact, the test

¹⁴ This, of course, assumes that AT&T has accurately typed the NPA/NXX

environment accurately reflects the production environment that exists on an upgraded version. For example, in production, if AT&T submits an LSR on the LSOR 5.00 version, it will receive LSOR 5.00 responses. In the test environment, the same situation occurs – the test environment mirrors production in this regard. However, AT&T wants to see what responses are returned on LSRs already in the pipeline. In other words, if AT&T submits an LSR on version 3.06 – and migrates to version 5.00 before the SOC notification is sent, AT&T wants to test whether the SOC for that **LSR** will be returned to AT&T in EDI 3.06 format (even though its EDI is currently on version 5.00).

51. But this is no different than the situation AT&T (and all EDI CLECs) faced when they migrated from version 3.02 to 3.03 to 3.04 to 3.05 to 3.06 to 5.00 to 5.01 to 5.02, etc. or any combination thereof. The process for pipeline orders is the same as it has been for all previous conversions. This is not an issue that a CLEC would need to test in the test environment, as the ability to receive an older version of notification is on the CLEC side of the interface and should not have changed in the process of updating its EDI interface to the specifications of the new version.
52. Moreover, AT&T can perform this test by taking a transaction that SBC has already transmitted to them (*e.g.*, a FOC that was transmitted in 3.06) and reflowing the transaction to itself again. AT&T will then be able to observe how its systems would handle receiving an order on 3.06 after migrating to a newer version of LSOG **5**. Pacific's test environment is capable of many other testing scenarios than those it was primarily designed for – EDI implementation and release testing. If a CLEC has a specific item or scenario it wants to test that is not in Pacific's test plans (for example, internal tables or receipt of older version notifications), it can experiment to discover the

most effective way to test the scenario or ask the *OSS* CLEC support group for possible ideas.

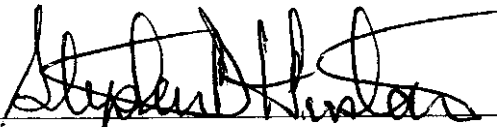
CONCLUSION

53. Pursuant to Part II. E. of the Consent Decree entered into between SBC Communications Inc. and the Federal Communications Commission, released on May 28,2002, see Order, *In the Matter of SBC Communications, Inc.*, 17 FCC Rcd 10780(2002), the undersigned hereby affirm that he or she has (1) received the training SBC is obligated **to** provide to all SBC FCC Representatives; (2) reviewed and understand **the** SBC Compliance Guidelines; (3) signed an acknowledgment of my training and review and understanding of the Guidelines; and (4) complied with the requirements of the SBC Compliance Guidelines.


54. This concludes our reply affidavit.

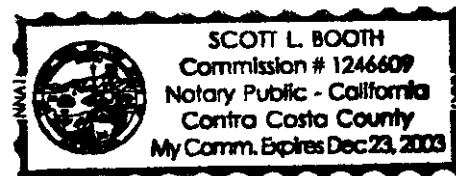
STATE OF California)
COUNTY OF Contra Costa

I declare under penalty of perjury that the foregoing **is** true and correct


(Stephen D. Huston)

Subscribed and sworn to before me this 30 day of October, 2002


Notary Public



STATE OF TEXAS

COUNTY OF DALLAS

I declare under penalty of perjury that the foregoing is true and correct.

Beth Lawson

Beth Lawson

Subscribed and sworn to **before** me this 1st day of Nov., 2002

Virginia L. Hampton

Notary Public

